

**IN THE SUPERIOR COURT FOR THE
STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
WASHINGTON COUNTY**

SUPERIOR COURT

WASHINGTON, SC.

STATE OF RHODE ISLAND

vs.

IND. No. W1-2013-0193A

**DANIEL E. DOYLE, JR.,
alias John Doe**

The Statewide Grand Jury of the State of Rhode Island and Providence Plantations
charges:

COUNT 1

That DANIEL E. DOYLE, JR., alias John Doe, of the State of Connecticut, on or about diverse days and dates from January 1, 2005 through December 31, 2011, in the State of Rhode Island, acting as officer, agent, clerk, servant, employee or other person for the Institute for International Sport (hereinafter referred to as "IIS"), to whom money or other property was entrusted for a specific purpose, said money or other property being of a value of over One Hundred Dollars (\$100.00), did embezzle or fraudulently convert to his own use said money or other property, to wit, an unauthorized salary from the IIS administered by Paychex and paid to Daniel E. Doyle, Jr., which came into his possession or was under his care or charge by virtue of his employment, in violation of §11-41-3 of the General Laws of Rhode Island, 1956, as amended (Reenactment of 2002).

COUNT 2

That DANIEL E. DOYLE, JR., alias John Doe, of the State of Connecticut, on or about diverse days and dates from March 1, 2005 through February 29, 2012, in the State

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of Rhode Island, acting as officer, agent, clerk, servant, employee or other person for the IIS, to whom money or other property was entrusted for a specific purpose, said money or other property being of a value of over One Hundred Dollars (\$100.00), did embezzle or fraudulently convert to his own use said money or other property, to wit, non-payroll payments, at times characterized as “loan repayments” or “bonuses,” from IIS bank accounts made to Daniel E. Doyle, Jr. and/or Katherine Doyle and checks made payable to “cash” and negotiated by Daniel E. Doyle, Jr., which came into his possession or was under his care or charge by virtue of his employment, in violation of §11-41-3 of the General Laws of Rhode Island, 1956, as amended (Reenactment of 2002).

COUNT 3

That DANIEL E. DOYLE, JR., alias John Doe, of the State of Connecticut, on or about diverse days and dates from March 1, 2005 through February 29, 2012, in the State of Rhode Island, acting as officer, agent, clerk, servant, employee or other person for the IIS, to whom money or other property was entrusted for a specific purpose, said money or other property being of a value of over One Hundred Dollars (\$100.00), did embezzle or fraudulently convert to his own use said money or other property, to wit, payments of IIS funds made to or for the benefit of non-IIS summer camps associated with Daniel E. Doyle, Jr., which came into his possession or was under his care or charge by virtue of his employment, in violation of §11-41-3 of the General Laws of Rhode Island, 1956, as amended (Reenactment of 2002).

COUNT 4

That DANIEL E. DOYLE, JR., alias John Doe, of the State of Connecticut, on or about diverse days and dates from March 1, 2005 through February 29, 2012, in the State

of Rhode Island, acting as officer, agent, clerk, servant, employee or other person for the IIS, to whom money or other property was entrusted for a specific purpose, said money or other property being of a value of over One Hundred Dollars (\$100.00), did embezzle or fraudulently convert to his own use said money or other property, to wit, payments made with IIS funds to and/or for the benefit of and/or in connection with the Hall of Fame Press and/or books being authored or co-authored by Daniel E. Doyle, Jr., which came into his possession or was under his care or charge by virtue of his employment, in violation of §11-41-3 of the General Laws of Rhode Island, 1956, as amended (Reenactment of 2002).

COUNT 5

That DANIEL E. DOYLE, JR., alias John Doe, of the State of Connecticut, on or about diverse days and dates from August 1, 2006 through February 29, 2012, in the State of Rhode Island, acting as officer, agent, clerk, servant, employee or other person for the IIS, to whom money or other property was entrusted for a specific purpose, said money or other property being of a value of over One Hundred Dollars (\$100.00), did embezzle or fraudulently convert to his own use said money or other property, to wit, payments made with IIS funds to American Express for non-IIS-related charges, which came into his possession or was under his care or charge by virtue of his employment, in violation of §11-41-3 of the General Laws of Rhode Island, 1956, as amended (Reenactment of 2002).

COUNT 6

That DANIEL E. DOYLE, JR., alias John Doe, of the State of Connecticut, on or about diverse days and dates from March 1, 2005 through February 29, 2012, in the State

of Rhode Island, acting as officer, agent, clerk, servant, employee or other person for the IIS, to whom money or other property was entrusted for a specific purpose, said money or other property being of a value of over One Hundred Dollars (\$100.00), did embezzle or fraudulently convert to his own use said money or other property, to wit, payments made with IIS funds to Kingswood Oxford School and/or Oberlin College, which came into his possession or was under his care or charge by virtue of his employment, in violation of §11-41-3 of the General Laws of Rhode Island, 1956, as amended (Reenactment of 2002).

COUNT 7

That DANIEL E. DOYLE, JR., alias John Doe, of the State of Connecticut, on or about diverse days and dates from March 1, 2005 through February 29, 2012, in the State of Rhode Island, acting as officer, agent, clerk, servant, employee or other person for the IIS, to whom money or other property was entrusted for a specific purpose, said money or other property being of a value of over One Hundred Dollars (\$100.00), did embezzle or fraudulently convert to his own use said money or other property, to wit, payments made with IIS Funds to Bates College, which came into his possession or was under his care or charge by virtue of his employment, in violation of §11-41-3 of the General Laws of Rhode Island, 1956, as amended (Reenactment of 2002).

COUNT 8

That DANIEL E. DOYLE, JR., alias John Doe, of the State of Connecticut, on or about diverse days and dates from May 21, 2007 through December 31, 2010, in the State of Rhode Island, did obtain money, being of a value of over Fifteen Hundred Dollars (\$1500.00), to wit, The Hassenfeld Foundation donation to the IIS designated for use on

the construction of the Hassenfeld-Hogg Center for Sports Leadership Building, from Alan Hassenfeld and/or The Hassenfeld Foundation, designedly by false pretenses, with intent to cheat or defraud Alan Hassenfeld and/or The Hassenfeld Foundation, in violation of §11-41-4 and §11-41-5 of the General Laws of Rhode Island, 1956, as amended (Reenactment of 2002).

COUNT 9

That DANIEL E. DOYLE, JR., alias John Doe, of the State of Connecticut, on or about the 10th day of December, 2009, in the State of Rhode Island, did falsely make, alter, forge, or counterfeit, or procured to be falsely made, altered, forged or counterfeited, a public record, to wit, the IIS's Non-Profit Corporation Annual Report for the Year 2009, knowing the same to be false, forged, altered, or counterfeited, in violation of §11-17-1 of the General Laws of Rhode Island, 1956, as amended (Reenactment of 2002).

COUNT 10

That DANIEL E. DOYLE, JR., alias John Doe, of the State of Connecticut, on or about the 14th day of December, 2009, in the State of Rhode Island, did knowingly give to an agent, employee and/or servant in public or private employ, or public official a document, to wit, the IIS's Non-Profit Corporation Annual Report for the Year 2009, in respect of which the principal, master, or employer, or state, city or town of which he or she is an official is interested, that contained a statement which was false or erroneous, or defective in an important particular, and which, to his knowledge, was intended to mislead the principal, master, employer, or state, city, or town of which he or she is an

official, in violation of §11-18-1 of the General Laws of Rhode Island, 1956, as amended (Reenactment of 2002).

COUNT 11

That DANIEL E. DOYLE, JR., alias John Doe, of the State of Connecticut, on or about the 12th day of June, 2008, in the State of Rhode Island, did falsely make, alter, forge, or counterfeit, or procured to be falsely made, altered, forged or counterfeited, a public record, to wit, the IIS's Non-Profit Corporation Annual Report for the year 2008, knowing the same to be false, forged, altered, or counterfeited, in violation of §11-17-1 of the General Laws of Rhode Island, 1956, as amended (Reenactment of 2002).

COUNT 12

That DANIEL E. DOYLE, JR., alias John Doe, of the State of Connecticut, on or about the 13th day of June, 2008, in the State of Rhode Island, did knowingly give to an agent, employee and/or servant in public or private employ, or public official a document, to wit, the IIS's Non-Profit Corporation Annual Report for the Year 2008, in respect of which the principal, master, or employer, or state, city or town of which he or she is an official is interested, that contained a statement which was false or erroneous, or defective in an important particular, and which, to his knowledge, was intended to mislead the principal, master, employer, or state, city, or town of which he or she is an official, in violation of §11-18-1 of the General Laws of Rhode Island, 1956, as amended (Reenactment of 2002).

COUNT 13

That DANIEL E. DOYLE, JR., alias John Doe, of the State of Connecticut, on or about the 6th day of June, 2007, in the State of Rhode Island, did falsely make, alter,

forge, or counterfeit, or procured to be falsely made, altered, forged or counterfeited, a public record, to wit, the IIS's Non-Profit Corporation Annual Report for the Year 2007, knowing the same to be false, forged, altered, or counterfeited, in violation of §11-17-1 of the General Laws of Rhode Island, 1956, as amended (Reenactment of 2002).

COUNT 14

That DANIEL E. DOYLE, JR., alias John Doe, of the State of Connecticut, on or about the 14th day of June, 2007, in the State of Rhode Island, did knowingly give to an agent, employee and/or servant in public or private employ, or public official a document, to wit, the IIS's Non-Profit Corporation Annual Report for the Year 2007, in respect of which the principal, master, or employer, or state, city or town of which he or she is an official is interested, that contained a statement which was false or erroneous, or defective in an important particular, and which, to his knowledge, was intended to mislead the principal, master, employer, or state, city, or town of which he or she is an official, in violation of §11-18-1 of the General Laws of Rhode Island, 1956, as amended (Reenactment of 2002).

COUNT 15

That DANIEL E. DOYLE, JR., alias John Doe, of the State of Connecticut, on or about the 13th day of April, 2007, in the State of Rhode Island, did falsely make, alter, forge, or counterfeit, or procured to be falsely made, altered, forged or counterfeited, a public record, to wit, the IIS's Non-Profit Corporation Annual Report for the Year 2006, knowing the same to be false, forged, altered, or counterfeited, in violation of §11-17-1 of the General Laws of Rhode Island, 1956, as amended (Reenactment of 2002).

COUNT 16

That DANIEL E. DOYLE, JR., alias John Doe, of the State of Connecticut, on or about the 16th day of April, 2007, in the State of Rhode Island, did knowingly give to an agent, employee and/or servant in public or private employ, or public official a document, to wit, the IIS's Non-Profit Corporation Annual Report for the Year 2006, in respect of which the principal, master, or employer, or state, city or town of which he or she is an official is interested, that contained a statement which was false or erroneous, or defective in an important particular, and which, to his knowledge, was intended to mislead the principal, master, employer, or state, city, or town of which he or she is an official, in violation of §11-18-1 of the General Laws of Rhode Island, 1956, as amended (Reenactment of 2002).

COUNT 17

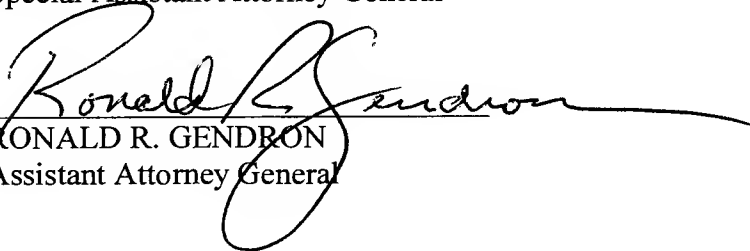
That DANIEL E. DOYLE, JR., alias John Doe, of the State of Connecticut, on or about the 21st day of September, 2005, in the State of Rhode Island, did falsely make, alter, forge, or counterfeit, or procured to be falsely made, altered, forged or counterfeited, a public record, to wit, the IIS's Non-Profit Corporation Annual Report for the Year 2005, knowing the same to be false, forged, altered, or counterfeited, in violation of §11-17-1 of the General Laws of Rhode Island, 1956, as amended (Reenactment of 2002).

COUNT 18

That DANIEL E. DOYLE, JR., alias John Doe, of the State of Connecticut, on or about the 23rd day of September, 2005, in the State of Rhode Island, did knowingly give to an agent, employee and/or servant in public or private employ, or public official a

document, to wit, the IIS's Non-Profit Corporation Annual Report for the Year 2005, in respect of which the principal, master, or employer, or state, city or town of which he or she is an official is interested, that contained a statement which was false or erroneous, or defective in an important particular, and which, to his knowledge, was intended to mislead the principal, master, employer, or state, city, or town of which he or she is an official, in violation of §11-18-1 of the General Laws of Rhode Island, 1956, as amended (Reenactment of 2002).


EMILY A. MARANJIAN
Special Assistant Attorney General


RONALD R. GENDRON
Assistant Attorney General

STATE OF RHODE ISLAND v. DANIEL E. DOYLE, JR.

A TRUE BILL

Denise M. Swining
FOREPERSON

Catherine Pellegrino
Dad E. Pellegrino
D. O'Neill
M. Haddad
Crista Bauck
Hanne C. Alarid
Susan H. Hagan
Carmelita
Robert D. Dalton
Patrick J. Walsh
G. E. Egan

Lucretia N. Ward
V. H. Halcik
H. Coronado
C. A.
Suzanne M. Paquette
Bryan V. Hild
Robert H. Hild